

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

JEROME L. JOHNSON,)	
)	
Plaintiff,)	No. 1:19-cv-00698
)	
v.)	
)	Honorable Ellen L. Hollander
BALTIMORE POLICE DEPARTMENT, <i>et al.</i>)	
)	
Defendants.)	

**CONSENT MOTION REGARDING THE DEADLINES FOR PLAINTIFF'S
RESPONSES TO MOTION TO BIFURCATE AND MOTION TO DISMISS**

Plaintiff Jerome L. Johnson (hereinafter "Plaintiff") respectfully files this Consent Motion Regarding the Deadlines for Plaintiff's Responses to Motion to Bifurcate and Motion to Dismiss, and in support states as follows:

1. Pursuant to the parties' joint request, the Court set December 24, 2021 as the deadline for filing dispositive motions. In the same order, the Court set February 11, 2022 as the deadline for filing responses and March 4, 2022 as the deadline for filing replies. ECF No. 135.
2. On December 24, 2021 the Baltimore Police Department and the Officer Defendants filed their respective Motions for Summary Judgment. ECF No. 136, ECF No. 138.
3. On the same date, the Defendants filed a Joint Motion to Bifurcate Trial. ECF No. 140. They also filed a Motion to Dismiss Plaintiff's Amended Complaint. ECF No. 137.
4. To ensure clarity and to avoid any confusion as to what qualifies as a "dispositive motion," and also to ensure that all briefing proceeds on the same timeline, Plaintiff requests

that the Court set February 11, 2022, as the response deadline and March 4, 2022, as the reply deadline for these two additional motions.

5. Defendants' respective counsel have consented to the requested relief, and this Motion is not made for any improper purpose or delay.

WHEREFORE Plaintiff, Jerome L. Johnson, with the consent of all Defendants, respectfully requests that the Court set the above deadlines for responses and replies to Defendants Motion to Bifurcate Trial and Motion to Dismiss as a Litigation Sanction.

Dated: January 7, 2022

Respectfully submitted,

/s/

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Office of Legal Affairs

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Department*

CERTIFICATE OF SERVICE

I, the undersigned attorney, hereby certify that I have caused true and correct copies of the above and foregoing to be served on all counsel of record via the Court's CM/ECF system, in accordance with the rules of electronic filing of documents, on January 7, 2022.

Respectfully Submitted,

/s/
Kobie A. Flowers